

1 LISA A. RASMUSSEN, ESQ.  
Nevada Bar No. 7491  
2 **LAW OFFICE OF LISA RASMUSSEN, P.C.**  
601 South 10<sup>th</sup> Street, Suite #100  
3 Las Vegas, NV 89101  
Tel. (702) 471-1436  
4 Fax. (702) 489-6619  
5 Email: [Lisa@LRasmussenLaw.com](mailto:Lisa@LRasmussenLaw.com)

6 MELANIE A. HILL, ESQ.  
Nevada Bar No. 8796  
7 **MELANIE HILL LAW PLLC**  
520 S. 7<sup>th</sup> Street, Suite A  
8 Las Vegas, NV 89101  
Tel. (702) 362-8500  
9 Fax. (702) 362-8505  
10 Email: [Melanie@MelanieHillLaw.com](mailto:Melanie@MelanieHillLaw.com)

11 *Attorneys for Plaintiff Scott Friedman*

12  
13 **UNITED STATES DISTRICT COURT**  
14 **DISTRICT OF NEVADA**

15  
16 SCOTT FRIEDMAN, an individual,

17 Plaintiff,

18 v.

19 UNITED STATES OF AMERICA; GENE M.  
20 TIERNEY, individually and in his official capacity  
21 as an FBI Agent; MATTHEW A. ZITO,  
22 individually and in his official capacity as an FBI  
23 Agent; THAYNE A. LARSON, individually and  
24 in his official capacity as an FBI Agent; LAS  
25 VEGAS METROPOLITAN POLICE  
26 DEPARTMENT; JOE LEPORE, P#6260,  
27 individually and in his official capacity as an  
28 officer of the LAS VEGAS METROPOLITAN  
POLICE DEPARTMENT; DARREN HEINER,  
P#2609, individually and in his official capacity as  
an officer of the LAS VEGAS METROPOLITAN  
POLICE DEPARTMENT; JASON HAHN,  
P#3371, individually and in his official capacity as

Case No. 2:18-CV-000857-JCM-VCF

**STIPULATION TO EXTEND  
PLAINTIFF'S DEADLINE TO OPPOSE  
DEFENDANT USA'S MOTION TO  
DISMISS [ECF No. 199] AND DEFENDANT  
USA'S DEADLINE TO REPLY,  
PLAINTIFF'S DEADLINE TO OPPOSE  
THE LVMPD DEFENDANTS' MOTION  
TO DISMISS [ECF NO. 201] AND THEIR  
MOTION TO STRIKE [ECF NO. 200]**

(First Request)

1 an officer of the LAS VEGAS METROPOLITAN  
2 POLICE DEPARTMENT; TALI ARIK, an  
3 individual; JULIE BOLTON, an individual; and  
ARIK VENTURES, an entity formed by Tali Arik,

4 Defendants.  
5  
6

7  
8 Counsel for Plaintiff, Melanie A. Hill of Melanie Hill Law PLLC and Lisa Rasmussen of Law  
9 Office of Lisa Rasmussen, P.C., counsel for the United States, Greg Addington, and counsel for  
10 Defendants Las Vegas Metropolitan Police Department, Joe Lepore, Darren Heiner, and Jason Hahn,  
11 Nick Crosby and Jackie Nichols, respectfully submit the following stipulation to extend the following  
12 deadlines:

- 13 1) Plaintiff's deadline to oppose the United States' Motion to Dismiss First Amended  
14 Complaint [ECF No. 199] is being extended to October 10, 2019 from its current deadline  
15 of October 4, 2019;  
16  
17 2) Defendant USA's deadline to file its Reply is being extended to October 18, 2019 from its  
18 new deadline of October 17, 2019;  
19  
20 3) Plaintiff's deadline to oppose the LVMPD Defendants' Motion to Dismiss First Amended  
21 Complaint [ECF No. 201] is being extended to October 12, 2019 from its current deadline  
22 of October 4, 2019; and  
23  
24 4) Plaintiff's deadline to oppose the LVMPD Defendants' Motion to Strike [ECF No. 200] is  
25 being extended to October 12, 2019 from its current deadline of October 4, 2019.

26 This is the first request to extend these deadlines. The Stipulation is being filed and these  
27 extensions are being requested due to the availability of counsel and not for purposes of delay.  
28 Plaintiff's counsel's illness with bronchitis and a double ear infection has kept her out of work all  
week due to its severity. Mr. Friedman had oppositions due this week to four Motions to Dismiss and  
the LVMPD's Motion to Strike. Two of the oppositions were prepared and filed by Ms. Hill's co-

1 counsel, Ms. Rasmussen and Ms. Hill is seeking these extensions due to her illness that kept her from  
2 completing these oppositions. Ms. Hill agreed to extend the USA's Reply deadline for an additional  
3 day to take into account the Columbus Day federal holiday on October 14, 2019 and as a result the  
4 USA's Reply deadline is also being extended to October 18, 2019.

5  
6 The requested relief is not for purposes of delay, but to allow for the availability of counsel.

7 DATED this 4<sup>th</sup> day of October, 2019.

8  
9 NICHOLAS TRUTANISH  
United States Attorney

MELANIE HILL LAW PLLC

10 By: /s/ Gregory Addington  
11 GREGORY ADDINGTON  
12 Assistant United States Attorney  
13 Nevada Bar No. 6875  
14 Attorneys for Defendant United States  
of America


By: /s/ Melanie A. Hill  
MELANIE A. HILL  
Nevada Bar No. 8796  
Attorneys for Plaintiff Scott Friedman

15  
16 MARQUIS AURBACH COFFING

17 By: /s/ Jacqueline Nichols  
18 JACQUELINE VICTORIA NICHOLS  
19 Nevada Bar No. 14246  
20 Attorneys for Las Vegas Metropolitan Police  
Department, Jason Hahn, Darren Heiner, and  
Joe Lepore

21  
22 **IT IS SO ORDERED.**

23 Dated October 9, 2019.

24   
25 JAMES C. MAHAN  
26 UNITED STATES DISTRICT COURT JUDGE  
27  
28